

LOWELL DECL. EX. 68

Exhibit 52

In the U.S. District Court
District of Columbia

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:
Shabtai Scott Shatsky, et :
al :
:
v. : NO. 1:02cv02280
:
The Syrian Arab Republic, :
et al :
:
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February 12, 2013

DEPOSITION OF:

Ronit Trattner,

a witness, called by counsel pursuant to notice,
commencing at 1:15 p.m., which was taken at Miller
and Chevalier, 655 15th Street, NW, Washington, DC
20005-5701

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<p>1 Mainsoft?</p> <p>2 A. I don't recall precisely. At the end of</p> <p>3 the year 2000.</p> <p>4 Q. How long did you work there?</p> <p>5 A. A few months.</p> <p>6 Q. Do you remember approximately what your</p> <p>7 salary was?</p> <p>8 A. No.</p> <p>9 Q. What was your next job after Mainsoft?</p> <p>10 A. I worked at RIT Technologies.</p> <p>11 Q. Why did you leave Mainsoft?</p> <p>12 A. It was a temporary student kind of job.</p> <p>13 Q. What position did you have at RIT?</p> <p>14 A. I was a programmer.</p> <p>15 Q. How long did you work there?</p> <p>16 A. Approximately two and a half years, I</p> <p>17 think.</p> <p>18 Q. Why did you leave RIT?</p> <p>19 A. Terminations, cutbacks.</p> <p>20 Q. Were you given a reason why you were let</p> <p>21 go from RIT?</p>	<p>1 BY MR. HILL:</p> <p>2 Q. What was your next job after RIT?</p> <p>3 A. Tegrity.</p> <p>4 Q. What was your position there?</p> <p>5 A. I was a software checker.</p> <p>6 Q. How long did you work at Tegrity?</p> <p>7 A. A few months. It was a temporary job.</p> <p>8 Q. When did you stop working at Tegrity?</p> <p>9 A. In June 2003 -- July 2003 I mean.</p> <p>10 Q. Do you remember how much you were paid</p> <p>11 when you worked at Mainsoft?</p> <p>12 A. No.</p> <p>13 Q. Do you remember how much you were paid</p> <p>14 when you worked at RIT?</p> <p>15 A. Yes.</p> <p>16 Q. How much were you paid when you were</p> <p>17 working at RIT?</p> <p>18 A. It was approximately 15,000.</p> <p>19 Q. 15,000 shekels?</p> <p>20 A. Yes, per month.</p> <p>21 Q. Do you remember how much you were being</p>
Page 15	Page 17
<p>1 MR. STEINER: Objection.</p> <p>2 THE WITNESS: There were general</p> <p>3 terminations and I was part of that.</p> <p>4 BY MR. HILL:</p> <p>5 Q. Were you ever told whether your</p> <p>6 performance was a reason for your termination from</p> <p>7 RIT?</p> <p>8 A. That was not the reason.</p> <p>9 Q. You understand that your performance at</p> <p>10 RIT was acceptable?</p> <p>11 A. To you or to them?</p> <p>12 Q. To RIT.</p> <p>13 A. Yes.</p> <p>14 Q. Did you receive performance reviews while</p> <p>15 you were at RIT?</p> <p>16 A. I don't recall precisely but I assume that</p> <p>17 I did.</p> <p>18 Q. Do you recall receiving any bad</p> <p>19 performance reviews while you were at RIT?</p> <p>20 MR. STEINER: Objection.</p> <p>21 THE WITNESS: I certainly did not.</p>	<p>1 paid for your work at Tegrity?</p> <p>2 A. No.</p> <p>3 Q. Where did you work after Tegrity?</p> <p>4 A. At MB Simulations.</p> <p>5 Q. What was your position at MB Simulations?</p> <p>6 A. Programmer.</p> <p>7 Q. How long did you work there?</p> <p>8 A. One year.</p> <p>9 Q. When did you leave MB Simulations?</p> <p>10 A. When Hodea was born.</p> <p>11 Q. August of 2003?</p> <p>12 A. In May 2005.</p> <p>13 Q. Why did you leave MB Simulations?</p> <p>14 A. I didn't really like that place.</p> <p>15 Q. Did anyone ask you to leave?</p> <p>16 A. No.</p> <p>17 Q. Where did you work next after</p> <p>18 MB Simulations?</p> <p>19 A. At ECI.</p> <p>20 Q. What was your position at ECI?</p> <p>21 A. Programmer.</p>

<p style="text-align: right;">Page 18</p> <p>1 Q. How long did you work there?</p> <p>2 A. Approximately five and a half years.</p> <p>3 Q. When did you stop working at ECI?</p> <p>4 A. In December 2011.</p> <p>5 Q. Why did you stop working at ECI?</p> <p>6 A. Terminations.</p> <p>7 Q. Were you told why you were being</p> <p>8 terminated?</p> <p>9 A. It was part of the general terminations.</p> <p>10 Q. Did anyone tell you that you were being</p> <p>11 terminated for performance reasons?</p> <p>12 A. No, I was told that it was not for that</p> <p>13 reason.</p> <p>14 Q. Where did you work after ECI?</p> <p>15 A. At Cadence.</p> <p>16 Q. Are you still employed at Cadence?</p> <p>17 A. Yes.</p> <p>18 Q. What positions have you held there?</p> <p>19 A. Programmer.</p> <p>20 Q. How much are you being paid to work as a</p> <p>21 programmer at Cadence?</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. After the explosion did you lose</p> <p>2 consciousness?</p> <p>3 A. No.</p> <p>4 Q. I understand that you yourself were</p> <p>5 injured in the explosion, is that correct?</p> <p>6 A. Yes, my face was burned, my hands and my</p> <p>7 legs were also burned and I have shrapnel in</p> <p>8 different parts of my body.</p> <p>9 Q. Were you hospitalized as a result of these</p> <p>10 injuries?</p> <p>11 A. Yes, I was hospitalized for ten days in</p> <p>12 the plastic surgery department.</p> <p>13 Q. Did you have any operations performed as a</p> <p>14 result of these injuries?</p> <p>15 A. It was not surgery. They attempted to</p> <p>16 remove shrapnel from my leg and they were</p> <p>17 unsuccessful so they left it there.</p> <p>18 Q. Apart from the attempt to remove the</p> <p>19 shrapnel, have you had any other surgeries or</p> <p>20 operations related to the injuries from</p> <p>21 February 2002?</p>
<p style="text-align: right;">Page 19</p> <p>1 A. 20,000.</p> <p>2 Q. 20,000 shekels a month?</p> <p>3 A. Yes.</p> <p>4 Q. How much did you make when you were</p> <p>5 working at ECI?</p> <p>6 A. Approximately 14 and a half.</p> <p>7 Q. 14,500 shekels a month?</p> <p>8 A. I think so. I don't really remember.</p> <p>9 Q. How much were you paid when you worked at</p> <p>10 MB Simulations?</p> <p>11 A. I don't remember.</p> <p>12 Q. Do you remember how much you were paid</p> <p>13 when you worked at Tegrity?</p> <p>14 A. No.</p> <p>15 Q. Ma'am, I understand that you were present</p> <p>16 when there was an explosion on February 16, 2002 in</p> <p>17 Karnei Shomron, is that correct?</p> <p>18 A. Yes.</p> <p>19 Q. Prior to the explosion did you see the</p> <p>20 person or persons who caused the explosion?</p> <p>21 A. No.</p>	<p style="text-align: right;">Page 21</p> <p>1 A. No.</p> <p>2 Q. Has anyone ever suggested to you that you</p> <p>3 should have additional surgeries or operations as a</p> <p>4 result of the injuries from February 2002?</p> <p>5 A. No.</p> <p>6 Q. Do the injuries that you received in</p> <p>7 February of 2002 affect your daily life today?</p> <p>8 A. Currently, not significantly.</p> <p>9 Q. Do the injuries you received in February</p> <p>10 of 2002 prevent you from doing anything today that</p> <p>11 you would like to do?</p> <p>12 MR. STEINER: Objection. I would ask</p> <p>13 that you clarify what injuries you are asking about,</p> <p>14 whether they are physical or emotional and</p> <p>15 psychological.</p> <p>16 MR. HILL: Any injuries.</p> <p>17 MR. STEINER: Ask that the witness</p> <p>18 be -- it be clear that the injuries you are</p> <p>19 discussing are limited to not only physical.</p> <p>20 THE WITNESS: I can't, for example,</p> <p>21 be with my husband the way I would like to be. I</p>

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<p>1 have to be on his right side because he was injured</p> <p>2 in his left ear so I always have to think about how</p> <p>3 to position myself next to him.</p> <p>4 In addition, whenever his eyes hurt or</p> <p>5 if something gets into his eye, I'm always -- my</p> <p>6 consciousness is -- I'm always aware of what will</p> <p>7 happen to the other eye and it's always somewhere on</p> <p>8 my mind worrying me.</p> <p>9 BY MR. HILL:</p> <p>10 Q. Did you finish your answer?</p> <p>11 A. I'm still thinking.</p> <p>12 (Pause)</p> <p>13 THE WITNESS: That's it.</p> <p>14 BY MR. HILL:</p> <p>15 Q. Ma'am, I had asked you about your injuries</p> <p>16 and I think your answer actually answered about your</p> <p>17 husband's injuries.</p> <p>18 MR. STEINER: Why don't you just pose</p> <p>19 the question, please? I wouldn't agree with your</p> <p>20 conclusion.</p> <p>21 MR. HILL: Let her answer.</p>	<p>1 translating your questions, not your commentary.</p> <p>2 MR. HILL: I didn't actually pose a</p> <p>3 question.</p> <p>4 I was posing a predicate and then you</p> <p>5 interrupted and the witness responded.</p> <p>6 MR. STEINER: Your predicate was</p> <p>7 commentary on her response.</p> <p>8 MR. HILL: Why don't you wait until</p> <p>9 the question is interpreted. Then if you have an</p> <p>10 objection, make the objection.</p> <p>11 MR. STEINER: Okay.</p> <p>12 BY MR. HILL:</p> <p>13 Q. Ma'am, as far as the physical injuries you</p> <p>14 received, the issue you described with having to be</p> <p>15 on your husband's right side, that's something</p> <p>16 that's because of his injuries, right?</p> <p>17 A. Correct.</p> <p>18 Q. You mentioned that you are concerned about</p> <p>19 your husband's eye, right?</p> <p>20 A. Yes.</p> <p>21 Q. That's a concern you have about his</p>
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<p>1 THE WITNESS: As far as I'm</p> <p>2 concerned, emotionally speaking the very fact that</p> <p>3 I'm always thinking about what will happen to</p> <p>4 Hillel's other eye, that has a tremendous impact on</p> <p>5 me in terms of my daily life.</p> <p>6 BY MR. HILL:</p> <p>7 Q. Let's have a conversation about protocol</p> <p>8 here. I think the question did not get translated</p> <p>9 on that occasion, is that right?</p> <p>10 THE INTERPRETER: There was a</p> <p>11 conversation between the two of you that was not</p> <p>12 translated and then Ms. Trattner started to say</p> <p>13 something which I interpreted for you.</p> <p>14 MR. HILL: Maybe what we should do is</p> <p>15 if you can wait until the interpreter gets done with</p> <p>16 the translation.</p> <p>17 Otherwise I'm afraid the witness is not</p> <p>18 actually getting everything in Hebrew and that the</p> <p>19 goal of this is to make sure she has it all in</p> <p>20 Hebrew.</p> <p>21 MR. STEINER: I think she should be</p>	<p>1 injuries, right?</p> <p>2 A. But I'm the one who is worried.</p> <p>3 Q. I understand.</p> <p>4 The physical injuries you received, the</p> <p>5 burns and the shrapnel that you received, do the</p> <p>6 physicals injuries you received prevent you from</p> <p>7 doing anything on a regular basis that you would</p> <p>8 like to do?</p> <p>9 A. No.</p> <p>10 Q. You were with your husband on February 16,</p> <p>11 2002 at the time of the explosion, right?</p> <p>12 A. Yes.</p> <p>13 Q. After the explosion did your husband</p> <p>14 remain conscious?</p> <p>15 MR. STEINER: Objection.</p> <p>16 THE WITNESS: Yes, he doesn't really</p> <p>17 recall but he did remain conscious.</p> <p>18 BY MR. HILL:</p> <p>19 Q. How long did he remain conscious after the</p> <p>20 blast?</p> <p>21 MR. STEINER: Objection.</p>

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<p>1 THE WITNESS: I don't know.</p> <p>2 I know that when we got on the</p> <p>3 ambulance I constantly spoke to him so that he would</p> <p>4 remain conscious.</p> <p>5 BY MR. HILL:</p> <p>6 Q. Were his eyes open while you were in the</p> <p>7 ambulance with him?</p> <p>8 A. I don't remember.</p> <p>9 Q. Did he say anything to you between the</p> <p>10 time of the blast and the time you arrived at the</p> <p>11 hospital?</p> <p>12 A. No.</p> <p>13 Q. Can you describe generally the type of</p> <p>14 injuries your husband received that night?</p> <p>15 A. Shrapnel went into his eye and as a result</p> <p>16 of that he lost his vision and he still has shrapnel</p> <p>17 in his head.</p> <p>18 He was injured in his ear.</p> <p>19 He was injured in his hand. He has shrapnel</p> <p>20 there. He's hypersensitive in his hand.</p> <p>21 Shrapnel entered into his foot and the nerve</p>	<p>1 Q. Which hand does he have this issue with?</p> <p>2 A. I think his right hand.</p> <p>3 Q. Have the difficulties with his hand that</p> <p>4 you described ever prevented him from doing</p> <p>5 something that you wished him to do?</p> <p>6 A. I can't think of anything at the moment.</p> <p>7 Q. Have the difficulties you described with</p> <p>8 his hand ever prevented him from doing something he</p> <p>9 wished to do?</p> <p>10 A. I think not.</p> <p>11 Q. How long was it before he was able to use</p> <p>12 his legs normally?</p> <p>13 MR. STEINER: Objection.</p> <p>14 THE WITNESS: A great deal of time.</p> <p>15 He had to undergo physiotherapy. Perhaps even half</p> <p>16 a year, five, six months.</p> <p>17 BY MR. HILL:</p> <p>18 Q. Is he able to use his legs normally today?</p> <p>19 MR. STEINER: Objection.</p> <p>20 THE WITNESS: When he puts shoes on,</p> <p>21 yes. Without shoes, if he's walking barefoot on</p>
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<p>1 there was severed which has an effect on his feeling</p> <p>2 there.</p> <p>3 And he has more shrapnel in different places</p> <p>4 throughout his body. I'm trying to think.</p> <p>5 (Pause)</p> <p>6 THE WITNESS: It took time until he</p> <p>7 went back to speaking like normal and to use his</p> <p>8 hands and his legs normally.</p> <p>9 BY MR. HILL:</p> <p>10 Q. Did you finish your answer?</p> <p>11 A. I think so.</p> <p>12 Q. Ma'am, today is he able to use his hands</p> <p>13 normally?</p> <p>14 MR. STEINER: Objection.</p> <p>15 THE WITNESS: Not entirely.</p> <p>16 BY MR. HILL:</p> <p>17 Q. In what respect is he not able to use his</p> <p>18 hands normally?</p> <p>19 A. In terms of the feeling when he touches</p> <p>20 things he doesn't always feel heat and cold or pain.</p> <p>21 He feels it but in a different kind of way.</p>	<p>1 things, he feels it differently and it's more of a</p> <p>2 hinderance to him.</p> <p>3 BY MR. HILL:</p> <p>4 Q. Has the issue with his legs that you've</p> <p>5 just described prevented him from doing anything you</p> <p>6 wanted him to do?</p> <p>7 A. No.</p> <p>8 Q. Have the issues with his legs that you've</p> <p>9 described prevented him from doing anything that he</p> <p>10 wanted to do?</p> <p>11 MR. STEINER: Objection.</p> <p>12 THE WITNESS: I think not.</p> <p>13 BY MR. HILL:</p> <p>14 Q. You mentioned that there was a period of</p> <p>15 time where he had some difficulty speaking, is that</p> <p>16 correct?</p> <p>17 A. Yes.</p> <p>18 Q. Is he able to speak normally today?</p> <p>19 MR. STEINER: Objection.</p> <p>20 THE WITNESS: Yes.</p> <p>21 BY MR. HILL:</p>

RONIT TRATTNER DEPOSITION

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Shatsky v. Syrian

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<p>1 Q. You mentioned that he had lost vision in</p> <p>2 one of his eyes, is that correct?</p> <p>3 A. Yes.</p> <p>4 Q. Which eye?</p> <p>5 A. The left eye.</p> <p>6 Q. Does the loss of vision in his left eye</p> <p>7 prevent him from doing anything that you would like</p> <p>8 him to do today?</p> <p>9 A. No.</p> <p>10 Q. Does the loss of vision in the left eye</p> <p>11 prevent him from doing anything that he would like</p> <p>12 to do, so far as you know?</p> <p>13 MR. STEINER: Objection.</p> <p>14 THE WITNESS: I think not.</p> <p>15 BY MR. HILL:</p> <p>16 Q. You mentioned that he still has some</p> <p>17 shrapnel in his hand, is that correct?</p> <p>18 A. Yes.</p> <p>19 Q. Do you believe the shrapnel in his head</p> <p>20 prevents him from doing anything he would like to do</p> <p>21 today?</p>	<p>1 MR. STEINER: Objection.</p> <p>2 THE WITNESS: No.</p> <p>3 BY MR. HILL:</p> <p>4 Q. While you were on the scene of the blast</p> <p>5 on the night of February 16, 2002 did you observe</p> <p>6 someone named Keren Shatsky?</p> <p>7 A. I don't recall.</p> <p>8 Q. Do you know Keren Shatsky?</p> <p>9 MR. STEINER: Objection.</p> <p>10 THE WITNESS: No.</p> <p>11 BY MR. HILL:</p> <p>12 Q. Do you know someone named Rachel Thaler?</p> <p>13 MR. STEINER: Objection.</p> <p>14 THE WITNESS: No.</p> <p>15 BY MR. HILL:</p> <p>16 Q. Do you know if you saw Rachel Thaler on</p> <p>17 the scene on February 16, 2002?</p> <p>18 A. I don't recall.</p> <p>19 Q. Do you know someone named Leor Thaler?</p> <p>20 A. No.</p> <p>21 Q. Do you know if you saw Leor Thaler on the</p>
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<p>1 A. No.</p> <p>2 Q. Do you believe the shrapnel in his head</p> <p>3 prevents him from doing anything he would like to</p> <p>4 do?</p> <p>5 MR. STEINER: Objection.</p> <p>6 THE WITNESS: I know that it prevents</p> <p>7 him from undergoing an MRI.</p> <p>8 BY MR. HILL:</p> <p>9 Q. Apart from --</p> <p>10 A. If necessary.</p> <p>11 Q. Has he ever needed an MRI that you are</p> <p>12 aware of?</p> <p>13 A. No.</p> <p>14 Q. Apart from the inability to have an MRI,</p> <p>15 can you think of any other way that the shrapnel in</p> <p>16 his head limits his activities?</p> <p>17 MR. STEINER: Objection.</p> <p>18 THE WITNESS: No.</p> <p>19 BY MR. HILL:</p> <p>20 Q. Has the shrapnel in his head damaged his</p> <p>21 brain in any way that you are aware of?</p>	<p>1 scene on February 16, 2002?</p> <p>2 A. I don't know.</p> <p>3 Q. Do you know someone named Steven Braun?</p> <p>4 A. No.</p> <p>5 Q. Do you know if you saw Mr. Braun on the</p> <p>6 scene on February 16, 2002?</p> <p>7 A. I do not know.</p> <p>8 Q. Do you remember meeting anyone on the</p> <p>9 scene on February 16, 2002?</p> <p>10 A. There were a lot of people around me. I</p> <p>11 didn't pay any attention to them.</p> <p>12 Q. Do you know the names of any of the people</p> <p>13 you encountered that night?</p> <p>14 A. I didn't meet them. I have no idea who</p> <p>15 they were.</p> <p>16 Q. Did you aid anyone on the scene that</p> <p>17 night?</p> <p>18 A. Only Hillel.</p> <p>19 Q. Do you want to take a break?</p> <p>20 A. No.</p> <p>21 Q. Do you believe you have a mental illness</p>

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1 a promotion because of the injuries that you
2 received in February 2002, is that correct?

3 MR. STEINER: Objection.

4 THE WITNESS: Correct.

5 BY MR. HILL:

6 Q. Do you have any reason to think that you
7 did not get a raise at any job you had after 2002
8 because you were injured in February of 2002?

9 A. All the rest of my jobs, no. At RIT I
10 don't know.

11 Q. Again, the reason you think you might have
12 gotten a raise at RIT is because you missed time
13 there because you were injured, correct?

14 MR. STEINER: Objection.

15 THE WITNESS: After my injuries and
16 because I was working on a part time basis.

17 BY MR. HILL:

18 Q. Did anyone ever tell you that if you
19 hadn't been injured or hadn't worked part time that
20 you would have gotten a raise?

21 A. No.

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1 Q. When you were terminated at RIT do you
2 know if anyone was hired to take the job you had
3 held?

4 A. Nobody.

5 Q. That position was eliminated?

6 A. You could say that.

7 Q. Were any persons who had positions higher
8 than you in RIT terminated as part of that same
9 cutback?

10 A. Yes, my team leader did too.

11 Q. If you had been promoted at RIT what was
12 the next position that you could have been promoted
13 to?

14 A. Perhaps a more senior programmer.

15 Q. Were there more senior programmers who
16 were terminated as part of the cutbacks in which you
17 were terminated?

18 A. I don't recall.

19 Q. Approximately how many people were
20 terminated from RIT at the same time that you were?

21 A. I don't recall how many but it was

1 widespread cutbacks.

2 Q. How large of a company was RIT at the time
3 that you were terminated?

4 A. I don't recall.

5 Q. Was it more than a hundred employees?

6 A. I think so.

7 Q. Do you think it was more than a thousand?

8 A. No.

9 Q. Are you aware of any evidence that Keren
10 Shatsky experienced any conscious pain or suffering
11 after the blast on February 16, 2002?

12 MR. STEINER: Objection.

13 THE WITNESS: I have no idea.

14 BY MR. HILL:

15 Q. I probably know the answer but let me
16 state it for the record.

17 Are you aware of any evidence that Rachel
18 Thaler experienced any conscious pain or suffering
19 between the time of the blast -- after the blast on
20 February 16, 2002?

21 A. I have no idea.

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1 Q. Ma'am, how many lawsuits have you filed as
2 a result of the events of February 16, 2002?

3 A. Two.

4 Q. Who have you sued?

5 A. This case and another case involving Arab
6 Bank.

7 Q. Are you aware of any evidence that the
8 Arab Bank had something to do with the bombing in
9 which you were injured?

10 A. To the best of my knowledge, the money
11 that was paid to the family of the suicide bomber
12 was taken from there.

13 Q. You said that was to the best of your
14 knowledge. What's the source of that knowledge?

15 A. I don't recall.

16 Q. Did someone tell you that?

17 A. I don't know how I know.

18 Q. Did anyone from the Arab Bank tell you
19 that?

20 A. No.

21 Q. Have you ever spoken to anyone from the

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<p>1 Arab Bank?</p> <p>2 A. No.</p> <p>3 Q. What is your best guess as to the source</p> <p>4 of the information you just related to me about the</p> <p>5 Arab Bank?</p> <p>6 MR. STEINER: Objection.</p> <p>7 THE WITNESS: I really don't recall.</p> <p>8 BY MR. HILL:</p> <p>9 Q. Did you believe you learned this from a</p> <p>10 person?</p> <p>11 A. I have no idea.</p> <p>12 Q. Do you believe you read it somewhere?</p> <p>13 A. I don't know.</p> <p>14 Q. Can you tell me the name of anyone who</p> <p>15 told you what you just told me?</p> <p>16 A. No.</p> <p>17 Q. Can you identify any document that</p> <p>18 contains the information you just shared with me?</p> <p>19 MR. STEINER: Objection.</p> <p>20 THE WITNESS: No.</p> <p>21 BY MR. HILL:</p>	<p>1 Q. Are you aware of any evidence that the</p> <p>2 Palestinian Authority had something to do with the</p> <p>3 bombing in which you were injured?</p> <p>4 MR. STEINER: Objection.</p> <p>5 THE WITNESS: It's a well known fact</p> <p>6 that the Palestinian Authority encourages terrorists</p> <p>7 to commit suicide bombings and subsequently pays</p> <p>8 their families, calls streets after them and very</p> <p>9 much encourages it.</p> <p>10 BY MR. HILL:</p> <p>11 Q. Did you finish your answer?</p> <p>12 A. Yes.</p> <p>13 Q. What is the source of the information that</p> <p>14 you just provided to me?</p> <p>15 A. Common knowledge. It's obvious. It's a</p> <p>16 well known fact.</p> <p>17 Q. You say it's common knowledge and it's a</p> <p>18 well known fact. How did you become aware of this</p> <p>19 common knowledge?</p> <p>20 A. I live in Israel. I hear news all the</p> <p>21 time. I assume that it was from there.</p>
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<p>1 Q. Anything at all you can recall about the</p> <p>2 source of your belief that money was paid to the</p> <p>3 suicide bomber by the Arab Bank?</p> <p>4 MR. STEINER: Objection.</p> <p>5 THE WITNESS: I don't recall.</p> <p>6 BY MR. HILL:</p> <p>7 Q. Do you know the name of the person who</p> <p>8 caused the explosion in which you were injured?</p> <p>9 A. I knew it but I don't recall it now.</p> <p>10 Q. Have you ever spoken to anyone from his</p> <p>11 family?</p> <p>12 A. No.</p> <p>13 Q. Have you ever spoken to anyone who had any</p> <p>14 responsibility in your mind for the bombing?</p> <p>15 MR. STEINER: Objection.</p> <p>16 THE WITNESS: No.</p> <p>17 BY MR. HILL:</p> <p>18 Q. You mentioned that you also brought this</p> <p>19 case. Do you know who the defendants are in this</p> <p>20 case?</p> <p>21 A. The Palestinian Authority and the PLO.</p>	<p>1 Q. Can you identify any source of the</p> <p>2 information you just provided to me about the</p> <p>3 Palestinian Authority other than the news?</p> <p>4 A. I don't know.</p> <p>5 Q. So you can't think of any source for the</p> <p>6 information you just provided me other than news</p> <p>7 reports, is that right?</p> <p>8 A. I don't know about the source of the</p> <p>9 information but it's very well known information.</p> <p>10 Q. Ma'am, I just want to make sure that you</p> <p>11 can't tell me of any sources of information about</p> <p>12 the Palestinian Authority that you related here</p> <p>13 today other than the news. Can you tell me another</p> <p>14 source other than the news?</p> <p>15 A. No.</p> <p>16 Q. Have you ever spoken to anyone from the</p> <p>17 Palestinian Authority?</p> <p>18 A. No.</p> <p>19 Q. You mentioned you also sued the PLO. Are</p> <p>20 you aware of any evidence that the PLO had something</p> <p>21 to do with the bombing in which you were injured?</p>

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<p>1 A. To the best of my knowledge, the terrorist</p> <p>2 was affiliated with the PLO.</p> <p>3 Q. What is the source of your belief that the</p> <p>4 terrorist was affiliated with the PLO?</p> <p>5 A. I don't recall. I simply know it.</p> <p>6 Q. Did someone tell you that the terrorist</p> <p>7 was affiliated with the PLO?</p> <p>8 A. I don't recall where I know it from.</p> <p>9 Q. Did anyone from the PLO tell you that?</p> <p>10 A. No.</p> <p>11 Q. Was this something you read in the news or</p> <p>12 saw in the media?</p> <p>13 A. I don't recall.</p> <p>14 Q. Can you think of anywhere that you could</p> <p>15 have learned about the affiliation of the terrorist</p> <p>16 with the PLO other than the media?</p> <p>17 A. I don't know.</p> <p>18 Q. Sitting here today you cannot identify a</p> <p>19 source for the belief that the terrorist was</p> <p>20 affiliated with the PLO other than the media, is</p> <p>21 that correct?</p>	<p>1 lawsuit pending against the Syrian Arab Republic?</p> <p>2 MR. STEINER: Objection.</p> <p>3 THE WITNESS: No, I don't. I think</p> <p>4 no.</p> <p>5 (A discussion takes place which is</p> <p>6 held off the record)</p> <p>7 THE WITNESS: No, there's not.</p> <p>8 BY MR. HILL:</p> <p>9 Q. Is there a dispute about the translation?</p> <p>10 THE INTERPRETER: No.</p> <p>11 BY MR. HILL:</p> <p>12 Q. I'm sorry?</p> <p>13 A. No, there's not.</p> <p>14 Q. Ma'am, have you ever spoken to the press</p> <p>15 or media about the events of February 16, 2002?</p> <p>16 A. We were once interviewed for a newspaper.</p> <p>17 I don't recall which one.</p> <p>18 Q. Let me show you what was previously marked</p> <p>19 as exhibit number 23.</p> <p>20 The document is in English. Are you able to</p> <p>21 read it sufficiently to tell me whether you've seen</p>
Page 71	Page 73
<p>1 A. I can't think of any at this moment.</p> <p>2 Q. You have not seen any documents indicating</p> <p>3 that the terrorist was affiliated with the PLO, is</p> <p>4 that correct?</p> <p>5 A. I did not see any such documents.</p> <p>6 Q. You can't recall anyone ever telling you</p> <p>7 that the terrorist was associated with the PLO, can</p> <p>8 you?</p> <p>9 A. No.</p> <p>10 Q. Are you aware of any evidence that the</p> <p>11 Syrian Arab Republic had something to do with the</p> <p>12 bombing in which you were injured?</p> <p>13 A. I don't know.</p> <p>14 Q. Do you know if you sued the Syrian Arab</p> <p>15 Republic?</p> <p>16 A. I think that they were related to this</p> <p>17 case but I don't recall at the moment, and they are</p> <p>18 currently not affiliated with it.</p> <p>19 However, I'm not proficient in all of the</p> <p>20 details.</p> <p>21 Q. Do you know if, in fact, you have a</p>	<p>1 it before?</p> <p>2 A. Yes.</p> <p>3 Q. Is this the newspaper interview that you</p> <p>4 were referring to?</p> <p>5 A. Yes.</p> <p>6 Q. Apart from this newspaper interview, did</p> <p>7 you have any other interviews or occasions where you</p> <p>8 spoke to the press?</p> <p>9 A. No.</p> <p>10 Q. Has your husband ever spoken to anyone in</p> <p>11 the press apart from the interview that's exhibit</p> <p>12 23?</p> <p>13 A. No.</p> <p>14 Q. Do you know if your mother-in-law or</p> <p>15 father-in-law have ever spoken to anyone from the</p> <p>16 press apart from the interview in exhibit 23?</p> <p>17 A. No.</p> <p>18 Q. Have you ever given a speech about the</p> <p>19 events of February 16, 2002?</p> <p>20 A. No.</p> <p>21 Q. Has your husband ever spoken publicly</p>

<p style="text-align: right;">Page 86</p> <p>1 A. Yes.</p> <p>2 Q. Ma'am, what is your best estimate of how</p> <p>3 frequently you and your husband were having sex on a</p> <p>4 monthly basis prior to the injuries you received in</p> <p>5 February of 2002?</p> <p>6 A. Four.</p> <p>7 MR. HILL: Subject to our outstanding</p> <p>8 requests for additional documents I don't have any</p> <p>9 further questions for Ms. Trattner at this time.</p> <p>10 MR. STEINER: Reserve the right to</p> <p>11 review and sign. I need a copy still of exhibit 23.</p> <p>12 MR. HILL: We'll take a break.</p> <p>13 The record is closed.</p> <p>14 (Deposition adjourned at 3:40 p.m.)</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p>	<p style="text-align: right;">Page 88</p> <p>1 Certificate of Deponent</p> <p>2 I hereby certify that I have read and</p> <p>3 examined the foregoing transcript, and the same</p> <p>4 is a true and accurate record of the testimony</p> <p>5 given by me.</p> <p>6 Any additions or corrections that I feel</p> <p>7 are necessary I will attach on a separate sheet</p> <p>8 of paper to the original transcript.</p> <p>9</p> <p>10 _____</p> <p>11 Signature of witness</p> <p>12 I hereby certify that the individual</p> <p>13 representing him/herself to be the above named</p> <p>14 individual, appeared before me this _____</p> <p>15 day of _____ and executed the above</p> <p>16 certificate in my presence.</p> <p>17</p> <p>18</p> <p>19</p> <p>20 _____</p> <p>21 Notary Public</p>
<p style="text-align: right;">Page 87</p> <p>1 Reporter's Certificate</p> <p>2</p> <p>3 I, the undersigned, Certified Court Reporter,</p> <p>4 do hereby certify that the foregoing transcript of</p> <p>5 testimony was taken by me in stenotype and</p> <p>6 thereafter reduced to print under my direction,</p> <p>7 that said transcript is a full, true and</p> <p>8 substantially accurate record of the proceedings,</p> <p>9 to the best of my ability.</p> <p>10 I do further certify that I am neither counsel</p> <p>11 for, related to, nor employed by any of the parties</p> <p>12 to the action in which this deposition was taken;</p> <p>13 and, further, that I am not a relative or employee</p> <p>14 of any attorney or counsel employed by the parties</p> <p>15 hereto, nor financially or otherwise interested</p> <p>16 in the outcome of the action.</p> <p>17</p> <p>18 /s/ Michael Feuer</p> <p>19 _____</p> <p>20 Certified Realtime Reporter</p> <p>21</p>	<p style="text-align: right;">Page 89</p> <p>1 Errata Page of Deponent</p> <p>2</p> <p>3 Please note any errors on this sheet. The</p> <p>4 reasons may be general, such as "to correct</p> <p>5 stenographic error" or "to clarify the record."</p> <p>6 When completed, send this page to the attorney</p> <p>7 who took your deposition, NOT the court reporter.</p> <p>8 Page Line Correction Reason For Change</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p>